MAY 2 2 2007

Wheeling Pittsburgh
STEEL CORPORATION
a metal products company

Patrick J. Smith
Engineer
Environmental Control

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May 14, 2007

Ms. Tammy Moore
U.S. Environmental Protection Agency
Region V
77 West Jackson Boulevard, DE-9J
Chicago, IL 60604-3507

Re: Request for RCRA Information (April 20, 2007)
WPSC Martins Ferry Plant

Dear Ms. Moore,

As referenced in Bud Smith's letter of May 14 to your attention, please find our responses and pertinent attachments to your April 20, 2007 RCRA information requests for the above referenced plant.

Please let us know if we can be of further assistance in this matter.

Sincerely,

Patrick J. Smith
Engineer, Environmental Control

cc: Ken Komoroski (K&L Gates)
Pamela Lee / USDOJ
ECSF
ECMF 1.4.3.6.2

Response to USEPA RCRA Information Request
Martins Ferry Plant

General

1. **Total Acreage of Martins Ferry facility** – The current acreage of the Martins Ferry facility is approximately 54 acres. We believe this was the original acreage as of the date Wheeling-Pittsburgh Steel was formed in 1968.

2. **Topographical map with ground surface elevation** – Attached is a topographical map obtained from the US Geological Survey website, Figure 1.

3. **Addresses of residences, schools, hospitals, and natural preserves nearby** – The Martins Ferry plant is located adjacent to commercial property to the west and south. A list of addresses is not in our possession. There are no schools, hospitals, or natural preserves nearby.

4. **Current and past production processes** – Current processes conducted by WPSC at the Martins Ferry plant include three continuous galvanizing lines. These lines provide a zinc coating on steel sheet via hot dipped technology. To prepare for galvanizing, most steel sheet is processed through an alkali bath, acid bath, and flux section, to provide cleaning, rust removal, and prepare for zinc coating.

5. **Past and present solid and hazardous wastes** – Attached are the annual hazardous waste reports for four of the past five calendar years, 2002 – 2006. In calendar year 2005, the Martins Ferry plant was a small quantity generator, and was not required to file a hazardous waste report. These reports indicate the hazardous wastes generated at the plant, as well as the management practices for these wastes.

6. **Past and present solid and hazardous waste management practices** – Same as response 5. above

7. **Site Plans, Photographs, Maps** – An aerial photo is attached as Figure 2. This was obtained from the internet using google earth. We do not know the date of the photo.

8. **Historical/Current Ownership and Operational History** - Refer to Bud Smith's letter of May 14, 2007.

9. **List of Permits** – Attachment 1 lists the current permits and other relevant environmental and business data for the WPSC Ohio plants. We have not included air or construction permits, since they didn't seem relevant for RCRA purposes.

   Non-compliance reports are submitted to the appropriate agency, as required. If requested, such non-compliance reports will be provided.

10. **Environmental/Health Regulatory Enforcement Involvement** – We have been in negotiations with Ohio EPA and USEPA for several years on various issues they feel have RCRA significance. We believe your reference list indicates you have access to all the relevant information.

11. **Historic/Current Maps/Lists/Descriptions of Various Areas** – Please refer to Figure 3 for a current map of areas of hazardous material handling as required by our SARA 312 report. Attachment 3 is the SARA 312 reporting forms for 2006, which correspond with and identify hazardous materials on the map.

    The wastewater treatment plant receives process wastewaters and some stormwaters from the Martins Ferry plant. These waters are primarily acidic in nature, and are lime-neutralized and aerated to form a precipitate. This precipitate is then agglomerated using a polymer, settled in the clarifier, and removed as a non-hazardous sludge for disposal.

12. **Historic/Current Storm Sewers** – Refer to Bud Smith's letter of May 14, 2007.

13. **List of chemical storage/dispensing locations** – Chemical storage/dispensing locations are shown in Figure 3 SARA 312 Map and described in the SARA 312 reporting forms (Attachment 3).

    Since 2002, there have been no federal reportable quantity spills.

Waste Management Areas/Units

14. **List of SWMUs and AOCs in Attachment 2** - Refer to Bud Smith's letter of May 14, 2007.

15. **Past/Planned Remedial Actions to Address Spills/Releases** – Refer to Bud Smith's letter of May 14, 2007.

16. **Sumps/Drains associated with hazardous materials** – Hazardous material sumps are routed to the wastewater treatment system for beneficial reuse and/or treatment.

17. **List of spills/releases of hazardous materials/wastes** - Since 2002, there have been no federal reportable quantity spills.

18. **Releases/spills impacting Stormwater** – Same response as 17. above.

19. **ARCO Scrubber Area** – Refer to Bud Smith's letter of May 14, 2007.

Stormwater/Wastewater Systems

20. **List of SWMUs and AOCs in Attachment 2; NPDES related –** Refer to Bud Smith's letter of May 14, 2007.

21. **Clay Pipeline -** Refer to Bud Smith's letter of May 14, 2007.

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22. **Sewer Sediment Removal -** Refer to Bud Smith's letter of May 14, 2007.

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Soil

23. **History of Closure Activities** – Refer to Bud Smith's letter of May 14, 2007.

24. **Background Sample** – Refer to Bud Smith's letter of May 14, 2007.

Air

25. **Baghouse** – Refer to Bud Smith's letter of May 14, 2007.

Groundwater

26. **Groundwater Supply Wells -** Refer to Bud Smith's letter of May 14, 2007.

27. **Groundwater Monitoring Data** – Refer to Bud Smith's letter of May 14, 2007.

28. **Geologic Cross Section diagram** – Refer to Bud Smith's letter of May 14, 2007.

29. **Groundwater Level data/contour maps** – Refer to Bud Smith's letter of May 14, 2007.

30. **Procedures to Identify/Close Wells** – Refer to Bud Smith's letter of May 14, 2007.

31. **Municipal Water Authority data -** Refer to Bud Smith's letter of May 14, 2007.

Attachments: Attachment 1 WPSC Ohio Plant Environmental Reference Numbers
Attachment 2 Hazardous Waste Reports, Martins Ferry Plant, 2002 – 2006 (19 pages)
Attachment 3 SARA 312 Report, 2006 Reporting Year, Martins Ferry (6 pages)

Figures: Figure 1 USGS Topographical Map
Figure 2 Aerial Photo (Google Earth), Martins Ferry Plant,
Figure 3 SARA 312 Map, Martins Ferry Plant, 8-50041

Figures are found in folder OHD 010 448 231
C.2 Compliance and Enforcement (2007 -)
Wheeling-Pittsburgh Steel (Martins Ferry)

Attachment 1 USEPA RCRA Information Response

Environmental Reference Numbers

Reference	SN	SS	YK	MF
Plant Owner	WPSC	WPSC	WPSC	WPSC
County	Jefferson	Jefferson	Jefferson	Belmont
Street Address	300 South 3rd Street	540 Commercial Avenue P.O. Box 186	219 Public Road	1001 Main Street
City/State/Zip	Steubenville, OH 43952	Mingo Junction, OH 43938	Yorkvillle, OH 43971	Martins Ferry, OH 43935
Guard Gate Phone #	740-283-5829	740-283-5587	740-859-6718	304-234-7244
River Mile #	Ohio 69	Ohio 71	Ohio 83.5	Ohio 88
SIC Code	3312	3312	3316	3479
NAICS Code	331111	331111	331221 & 332811	332813 & 332114
Dun and Bradstreet # (Wheeling: 00-138-1409)	00-413-9562	01-819-9778	08-296-4313	01-044-8231
Federal Employee ID # (FEIN)	55-070-3273			
EPA ID #	**OHD 000 810 382**	**OHD 980 618 177**	**OHD 082 964 313**	**OHD 010 448 231**
RCRA Generator Status*	Small or Large Quantity Generator	Large Quantity Generator	Small or Large Quantity Generator	Small or Large Quantity Generator
Air Emission Fees Facility ID #	T 0641090010		T 0641120012	T 0607090013
NPDES Permit #	OID00033*FD	0ID00034*FD	OID00035*DD	OIC00020*CD
Issue Date	6/30/05	9/29/06	6/25/04	6/28/04
Effective Permit Date	8/1/05	11/1/06	8/1/04	8/1/04
Permit Expiration Date	7/31/09	3/31/10	1/31/09	1/31/09
Renewal Application Date	1/31/09	9/30/09	7/31/08	7/31/08
Total Permitted Outfalls	24	27	13	5

Waste description: Page no: 1

Chromium waste from surface treatment of steel

D007

Attachment 2

Mgmt method code:

Source code: G33

Waste form code: W316 RCRA radioactive mixed? ○ Yes ● No

Quantity Generated

Previous year: 14180

This year: 3720

Unit of measure: P Density: ○ lbs/gal ○ sg

Was this waste treated, disposed of, or recycled on-site? ○ Yes ● No

	System 1	System 2
RCRA-exempt system?	☐	☐
On-site system type		
Quantity treated, disposed or recycled in the reporting year:		

Was any of the waste shipped off-site during the reporting year? ● Yes ○ No

EPA ID of Receiver	Mgmt method code	Total Quantity Shipped in Reporting Year
MID000724831	H111	3720

As of December 31st, did any of this waste remain on site in:

A greater than 90 day storage unit? ○ Yes ○ No

☐ Generated during the reporting year

☐ Generated prior to reporting year

An inactive disposal unit undergoing closure? ○ Yes ○ No

Storage or Disposal Unit	Handling Code	Amount	Unit of Measure	Density	Density Unit
1					

Comments:

Waste description: Page no: 2

Obsolete Marking Ink

D001 F003

Mgmt method code:

Source code: G11

Waste form code: W209 RCRA radioactive mixed? ○ Yes ● No

Quantity Generated

Previous year: 2400

This year: 6738

Unit of measure: P Density: ○ lbs/gal ○ sg

Was this waste treated, disposed of, or recycled on-site? ○ Yes ● No

	System 1	System 2
RCRA-exempt system?	☐	☐
On-site system type		
Quantity treated, disposed or recycled in the reporting year:		

Was any of the waste shipped off-site during the reporting year? ● Yes ○ No

EPA ID of Receiver	Mgmt method code	Total Quantity Shipped in Reporting Year
KYD053348108	H061	3850
OHD980897656	H061	2063
OHD980897656	H141	825

As of December 31st, did any of this waste remain on site in:

A greater than 90 day storage unit? ○ Yes ○ No

☐ Generated during the reporting year

☐ Generated prior to reporting year

An inactive disposal unit undergoing closure? ○ Yes ○ No

Storage or Disposal Unit	Handling Code	Amount	Unit of Measure	Density	Density Unit
1					

Comments:

Waste description:

Waste petroleum distillates from parts washers

D028 D039 D040

Mgmt method code:

Source code: G09

Waste form code: W211

RCRA radioactive mixed? ○ Yes ● No

Quantity Generated

Previous year: 500

This year: 525

Unit of measure: G Density: 6.70 ● lbs/gal ○ sg

Was this waste treated, disposed of, or recycled on-site? ○ Yes ● No

	System 1	System 2
RCRA-exempt system?	☐	☐
On-site system type		
Quantity treated, disposed or recycled in the reporting year:		

Was any of the waste shipped off-site during the reporting year? ● Yes No

EPA ID of Receiver	Mgmt method code	Total Quantity Shipped in Reporting Year
WVD981034101	H141	525

As of December 31st, did any of this waste remain on site in:

A greater than 90 day storage unit? ○ Yes ○ No

☐ Generated during the reporting year

☐ Generated prior to reporting year

An inactive disposal unit undergoing closure? ○ Yes ○ No

Storage or Disposal Unit	Handling Code	Amount	Unit of Measure	Density	Density Unit
1					

Comments:

Source Code G09: Physical cleaning of grease and oil contaminated parts using solvent.

Waste description: Page no: 4

Rags and gloves contaminated by parts washer solvent

D006 D039 D040

Mgmt method code:

Source code: G09

Waste form code: W409 RCRA radioactive mixed? Yes ● No

Quantity Generated

Previous year: 2705

This year: 200

Unit of measure: P Density: ○ lbs/gal ○ sg

Was this waste treated, disposed of, or recycled on-site? ○ Yes ● No

	System 1	System 2
RCRA-exempt system?	☐	☐
On-site system type		
Quantity treated, disposed or recycled in the reporting year:		

Was any of the waste shipped off-site during the reporting year? ● Yes ○ No

EPA ID of Receiver	Mgmt method code	Total Quantity Shipped in Reporting Year
ILD980613913	H061	200

As of December 31st, did any of this waste remain on site in:

A greater than 90 day storage unit? ○ Yes ○ No

☐ Generated during the reporting year

☐ Generated prior to reporting year

An inactive disposal unit undergoing closure? ○ Yes ○ No

Storage or Disposal Unit	Handling Code	Amount	Unit of Measure	Density	Density Unit
1					

Comments:

Source Code G09: Physical cleaning of grease and oil contaminated parts using solvent.
Waste Form Code W409: Cloth rags and gloves containing traces of solvent.

Waste description: Page no: 5

Waste gasoline from former UST leak

D001 D008 D018

Mgmt method code:

Source code: G45

Waste form code: W219 RCRA radioactive mixed? ○ Yes ● No

Quantity Generated

Previous year: 0

This year: 45

Unit of measure: G Density: 7.00 ● lbs/gal ○ sg

Was this waste treated, disposed of, or recycled on-site? ○ Yes ● No

	System 1	System 2
RCRA-exempt system?	--	--
On-site system type		
Quantity treated, disposed or recycled in the reporting year:		

Was any of the waste shipped off-site during the reporting year? ● Yes ○ No

EPA ID of Receiver	Mgmt method code	Total Quantity Shipped in Reporting Year
OHD066060609	H061	45

As of December 31st, did any of this waste remain on site in:

A greater than 90 day storage unit? ○ Yes ○ No

☐ Generated during the reporting year

☐ Generated prior to reporting year

An inactive disposal unit undergoing closure? ○ Yes ○ No

Storage or Disposal Unit	Handling Code	Amount	Unit of Measure	Density	Density Unit
1					

Comments:

Waste form code W219: Gasoline and water mix recovered as free product from UST monitoring activities.

Waste description: Page no: 6

Waste paint related solids

D001 D007 D008 D035

Mgmt method code:

Source code: G06

Waste form code: W409

RCRA radioactive mixed? Yes ● No

Quantity Generated

Previous year: 0

This year: 600

Unit of measure: P Density: ○ lbs/gal ○ sg

Was this waste treated, disposed of, or recycled on-site? ○ Yes ● No

	System 1	System 2
RCRA-exempt system?	☐	☐
On-site system type		
Quantity treated, disposed or recycled in the reporting year:		

Was any of the waste shipped off-site during the reporting year? ● Yes ○ No

EPA ID of Receiver	Mgmt method code	Total Quantity Shipped in Reporting Year
KYD053348108	H061	600

As of December 31st, did any of this waste remain on site in:

A greater than 90 day storage unit? ○ Yes ○ No

☐ Generated during the reporting year

☐ Generated prior to reporting year

An inactive disposal unit undergoing closure? ○ Yes ○ No

Storage or Disposal Unit	Handling Code	Amount	Unit of Measure	Density	Density Unit
1					

Comments:

Waste form code W409: Paint/ink solids and cleanup absorbents from ink application areas, containing some free liquid.

Window: "2003 Annual report for WPSC Martins Ferry"

Waste description: Page no: 1

Chromium waste from surface treatment of steel

D007

Mgmt method code:

Source code: G33

Waste form code: W316 RCRA radioactive mixed? ◯ Yes ◯ No

Quantity Generated

Previous year: 3720

This year: 11900

Unit of measure: P Density: ◯ lbs/gal ◯ sg

Was this waste treated, disposed of, or recycled on-site? ◯ Yes ● No

	System 1	System 2
RCRA-exempt system?	☐	☐
On-site system type		
Quantity treated, disposed or recycled in the reporting year:		

Was any of the waste shipped off-site during the reporting year? ● Yes ◯ No

PA ID of Receiver	Mgmt method code	Total Quantity Shipped in Reporting Year
MID00072483	H111	11900

As of December 31st, did any of this waste remain on site in:

A greater than 90 day storage unit? ◯ Yes ● No

☐ Generated during the reporting year

☐ Generated prior to reporting year

An inactive disposal unit undergoing closure? ◯ Yes ● No

Storage or Disposal Unit	Handling Code	Amount	Unit of Measure	Density	Density Unit
1					

Comments:

Printed on 2/27/04 at 13:19:39

Window: "2003 Annual report for WPSC Martins Ferry"

Waste description: Page no: 2

Obsolete Marking Ink

D001 F003

Mgmt method code:

Source code: G11

Waste form code: W209

RCRA radioactive mixed? ◯ Yes ◯ No

Quantity Generated

Previous year: 6738

This year: 4650

Unit of measure: P Density: ◯ lbs/gal ◯ sg

Was this waste treated, disposed of, or recycled on-site? ◯ Yes ● No

	System 1	System 2
RCRA-exempt system?	☐	☐
On-site system type		
Quantity treated, disposed or recycled in the reporting year:		

Was any of the waste shipped off-site during the reporting year? ● Yes ◯ No

PA ID of Receiver	Mgmt method code	Total Quantity Shipped in Reporting Year
KYD053348108	H061	4650

As of December 31st, did any of this waste remain on site in:

A greater than 90 day storage unit? ◯ Yes ◯ No

☐ Generated during the reporting year

☐ Generated prior to reporting year

An inactive disposal unit undergoing closure? ◯ Yes ◯ No

Storage or Disposal Unit	Handling Code	Amount	Unit of Measure	Density	Density Unit
1					

Comments:

Printed on 2/27/04 at 13:20:22

Waste description: Page no: 3

Waste petroleum distaillates from parts washers

D028 | D039 | D040

Mgmt method code:

Source code: G09

Waste form code: W211

RCRA radioactive mixed? ○ Yes ○ No

Quantity Generated

Previous year: 525

This year: 460

Unit of measure: G Density: 6.70 ● lbs/gal ○ sg

Was this waste treated, disposed of, or recycled on-site? ○ Yes ● No

	System 1	System 2
RCRA-exempt system?	☐	☐
On-site system type		
Quantity treated, disposed or recycled in the reporting year:		

Was any of the waste shipped off-site during the reporting year? ● Yes ○ No

PA ID of Receiver	Mgmt method code	Total Quantity Shipped in Reporting Year
WVD98103410	H141	460

As of December 31st, did any of this waste remain on site in:

A greater than 90 day storage unit? ○ Yes ○ No

☐ Generated during the reporting year

☐ Generated prior to reporting year

An inactive disposal unit undergoing closure? ○ Yes ○ No

Storage or Disposal Unit	Handling Code	Amount	Unit of Measure	Density	Density Unit
1					

Comments:

Source Code G09: Physical cleaning of grease and oil contaminated parts using solvent.

Window: "2003 Annual report for WPSC Martins Ferry"

Waste description: Page no: 4

Mercury contaminated debris from spill

D009

Mgmt method code:

Source code: G32

Waste form code: W002 RCRA radioactive mixed? ◯ Yes ◯ No

Quantity Generated

Previous year: 0

This year: 15

Unit of measure: P Density: ◯ lbs/gal ◯ sg

Was this waste treated, disposed of, or recycled on-site? ◯ Yes ● No

	System 1	System 2
RCRA-exempt system?	☐	☐
On-site system type		
Quantity treated, disposed or recycled in the reporting year:		

Was any of the waste shipped off-site during the reporting year? ● Yes ◯ No

PA ID of Receiver	Mgmt method code	Total Quantity Shipped in Reporting Year
OHD00081662	H141	15

As of December 31st, did any of this waste remain on site in:

A greater than 90 day storage unit? ◯ Yes ◯ No

☐ Generated during the reporting year

☐ Generated prior to reporting year

An inactive disposal unit undergoing closure? ◯ Yes ◯ No

Storage or Disposal Unit	Handling Code	Amount	Unit of Measure	Density	Density Unit
1					

Comments:

Printed on 2/27/04 at 13:21:32

Window: "2004 Annual report for WPSC Martins Ferry"

Waste description: Page no: 1

Chromium waste from surface treatment of steel

D007

Mgmt method code:

Source code: G33

Waste form code: W316

Quantity Generated

Previous year: 11900

This year: 10840

Unit of measure: P Density: ○ lbs/gal ○ sg

Was this waste treated, disposed of, or recycled on-site? ○ Yes ● No

	System 1	System 2
RCRA-exempt system?	☐	☐
On-site system type		
Quantity treated, disposed or recycled in the reporting year:		

Was any of the waste shipped off-site during the reporting year? ● Yes ○ No

EPA ID of Receiver	Mgmt method code	Total Quantity Shipped in Reporting Year
MID00072483	H111	10840

As of December 31st, did any of this waste remain on site in:

A greater than 90 day storage unit? ○ Yes ● No

☐ Generated during the reporting year

☐ Generated prior to reporting year

An inactive disposal unit undergoing closure? ○ Yes ● No

Storage or Disposal Unit	Handling Code	Amount	Unit of Measure	Density	Density Unit
1					

Comments:

Printed on 2/4/2005 at 17:16:08

Waste description: Page no: 2

Obsolete Marking Ink

D001 | F003 | | | |

Mgmt method code:

Source code: G11

Waste form code: W209

Quantity Generated

Previous year: 4650

This year: 4400

Unit of measure: P Density: ○ lbs/gal ○ sg

Was this waste treated, disposed of, or recycled on-site? ○ Yes ● No

	System 1	System 2
RCRA-exempt system?	☐	☐
On-site system type		
Quantity treated, disposed or recycled in the reporting year:		

Was any of the waste shipped off-site during the reporting year? ● Yes ○ No

EPA ID of Receiver	Mgmt method code	Total Quantity Shipped in Reporting Year
KYD05334810	H061	4400

As of December 31st, did any of this waste remain on site in:

A greater than 90 day storage unit? ○ Yes ● No

☐ Generated during the reporting year

☐ Generated prior to reporting year

An inactive disposal unit undergoing closure? ○ Yes ● No

Storage or Disposal Unit	Handling Code	Amount	Unit of Measure	Density	Density Unit
1					

Comments:

Window: "2004 Annual report for WPSC Martins Ferry"

Waste description: Page no: 3

Waste petroleum distillates from parts washers

D028 | D039 | D040 | | |

Mgmt method code:

Source code: G09

Waste form code: W211

Quantity Generated

Previous year: 460

This year: 425

Unit of measure: G Density: 6.70 ● lbs/gal ○ sg

Was this waste treated, disposed of, or recycled on-site? ○ Yes ● No

	System 1	System 2
RCRA-exempt system?	☐	☐
On-site system type		
Quantity treated, disposed or recycled in the reporting year:		

Was any of the waste shipped off-site during the reporting year? ● Yes ○ No

EPA ID of Receiver	Mgmt method code	Total Quantity Shipped in Reporting Year
WVD981034107	H141	425

As of December 31st, did any of this waste remain on site in:

A greater than 90 day storage unit? ○ Yes ● No

☐ Generated during the reporting year

☐ Generated prior to reporting year

An inactive disposal unit undergoing closure? ○ Yes ● No

Storage or Disposal Unit	Handling Code	Amount	Unit of Measure	Density	Density Unit
1					

Comments:

Source Code G09: Physical cleaning of grease and oil contaminated parts using solvent.

Window: "2006 Annual report for WPSC Martins Ferry"

Waste description (60 spaces max): Page no: 1

Chromium waste from surface treatment of steel

D007

Mgmt method code:

Source code: G33

Waste form code: W316

Quantity Generated

Previous year: 10520

This year: 14160

Unit of measure: P Density: ○ lbs/gal ○ sg

Was this waste treated, disposed of, or recycled on-site? ○ Yes ● No

	System 1	System 2
RCRA-exempt system?	☐	☐
On-site system type		
Quantity treated, disposed or recycled in the reporting year:		

Was any of the waste shipped off-site during the reporting year? ● Yes ○ No

EPA ID of Receiver	Mgmt method code	Total Quantity Shipped in Reporting Year
MID000724831	H111	14160

As of December 31st, did any of this waste remain on site in:

A greater than 90 day storage unit? ○ Yes ● No

☐ Generated during the reporting year

☐ Generated prior to reporting year

An inactive disposal unit undergoing closure? ○ Yes ● No

Storage or Disposal Unit	Handling Code	Amount	Unit of Measure	Density	Density Unit
1					

Comments:

Printed on 2/28/2007 at 11:10:49

Window: "2006 Annual report for WPSC Martins Ferry"

Waste description (60 spaces max): Page no: 2

Sludge from marking ink solvent recovery

D001

Mgmt method code:

Source code: G07

Waste form code: W604

Quantity Generated

Previous year: 2200

This year: 1550

Unit of measure: P Density: ○ lbs/gal ○ sg

Was this waste treated, disposed of, or recycled on-site? ○ Yes ● No

	System 1	System 2
RCRA-exempt system?	☐	☐
On-site system type		
Quantity treated, disposed or recycled in the reporting year:		

Was any of the waste shipped off-site during the reporting year? ● Yes ○ No

EPA ID of Receiver	Mgmt method code	Total Quantity Shipped in Reporting Year
KYD053348108	H061	1550

As of December 31st, did any of this waste remain on site in:

A greater than 90 day storage unit? ○ Yes ● No

☐ Generated during the reporting year

☐ Generated prior to reporting year

An inactive disposal unit undergoing closure? ○ Yes ● No

Storage or Disposal Unit	Handling Code	Amount	Unit of Measure	Density	Density Unit
1					

Comments:

Window: "2006 Annual report for WPSC Martins Ferry"

Waste description (60 spaces max): Page no: 3

Spent Ink Debris

D001

Mgmt method code:

Source code: G06

Waste form code: W604

Quantity Generated

Previous year: 0

This year: 600

Unit of measure: P Density: ○ lbs/gal ○ sg

Was this waste treated, disposed of, or recycled on-site? ○ Yes ● No

	System 1	System 2
RCRA-exempt system?	☐	☐
On-site system type		
Quantity treated, disposed or recycled in the reporting year:		

Was any of the waste shipped off-site during the reporting year? ● Yes ○ No

EPA ID of Receiver	Mgmt method code	Total Quantity Shipped in Reporting Year
KYD053348108	H061	600

As of December 31st, did any of this waste remain on site in:

A greater than 90 day storage unit? ○ Yes ● No

☐ Generated during the reporting year

☐ Generated prior to reporting year

An inactive disposal unit undergoing closure? ○ Yes ● No

Storage or Disposal Unit	Handling Code	Amount	Unit of Measure	Density	Density Unit
1					

Comments:

Window: "2006 Annual report for WPSC Martins Ferry"

Waste description (60 spaces max): Page no: 4

Waste petroleum distillates from parts washers

D028 | D039 | D040 | | |

Mgmt method code:

Source code: G09

Waste form code: W211

Quantity Generated

Previous year: 425

This year: 438

Unit of measure: G Density: 6.70 ● lbs/gal ○ sg

Was this waste treated, disposed of, or recycled on-site? ○ Yes ● No

	System 1	System 2
RCRA-exempt system?	☐	☐
On-site system type		
Quantity treated, disposed or recycled in the reporting year:		

Was any of the waste shipped off-site during the reporting year? ● Yes ○ No

EPA ID of Receiver	Mgmt method code	Total Quantity Shipped in Reporting Year
WVD981034101	H141	438

As of December 31st, did any of this waste remain on site in:

A greater than 90 day storage unit? ○ Yes ● No

☐ Generated during the reporting year

☐ Generated prior to reporting year

An inactive disposal unit undergoing closure? ○ Yes ● No

Storage or Disposal Unit	Handling Code	Amount	Unit of Measure	Density	Density Unit
1					

Comments:

Source Code G09: Physical cleaning of grease and oil contaminated parts using solvent.

Window: "2006 Annual report for WPSC Martins Ferry"

Waste description (60 spaces max): Page no: 5

Acidic Process Cleanout

D002 | D007 | D008 | | |

Mgmt method code:

Source code: G08

Waste form code: W105

Quantity Generated

Previous year: 0

This year: 19100

Unit of measure: G Density: 10.00 ● lbs/gal ○ sg

Was this waste treated, disposed of, or recycled on-site? ○ Yes ● No

	System 1	System 2
RCRA-exempt system?	☐	☐
On-site system type		
Quantity treated, disposed or recycled in the reporting year:		

Was any of the waste shipped off-site during the reporting year? ● Yes ○ No

EPA ID of Receiver	Mgmt method code	Total Quantity Shipped in Reporting Year
OHD004178612	H124	14100
MID980991566	H111	5000

As of December 31st, did any of this waste remain on site in:

A greater than 90 day storage unit? ○ Yes ● No

☐ Generated during the reporting year

☐ Generated prior to reporting year

An inactive disposal unit undergoing closure? ○ Yes ● No

Storage or Disposal Unit	Handling Code	Amount	Unit of Measure	Density	Density Unit
1					

Comments:

Window: "2006 Annual report for WPSC Martins Ferry"

Waste description (60 spaces max): Page no: 6

Used oil contaminated with caustic

D002

Mgmt method code:

Source code: G31

Waste form code: W206

Quantity Generated

Previous year: 0

This year: 5000

Unit of measure: G Density: 8.00 ● lbs/gal ○ sg

Was this waste treated, disposed of, or recycled on-site? ○ Yes ● No

	System 1	System 2
RCRA-exempt system?	☐	☐
On-site system type		
Quantity treated, disposed or recycled in the reporting year:		

Was any of the waste shipped off-site during the reporting year? ● Yes ○ No

EPA ID of Receiver	Mgmt method code	Total Quantity Shipped in Reporting Year
OHD004178612	H124	5000

As of December 31st, did any of this waste remain on site in:

A greater than 90 day storage unit? ○ Yes ● No

☐ Generated during the reporting year

☐ Generated prior to reporting year

An inactive disposal unit undergoing closure? ○ Yes ● No

Storage or Disposal Unit	Handling Code	Amount	Unit of Measure	Density	Density Unit
1					

Comments:

Revised [illegible] 1990

Tier Two
EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification

WHEELING-PITTSBURGH STEEL CORPORATION
1001 MAIN ST.
MARTINS FERRY, OH 43935 BELMONT COUNTY

SIC Code 3 4 7 9 Dun & Brad Number 0 5 - 3 1 5 - 8 8 8 7

For OFFICIAL USE ONLY: ID# / Date Received

Owner/Operator Name Attachment 3

Name Wheeling 32

Mail Address 1134 Market Street, Wheeling , WV 26003

Emergency Contact

Name Patrick J. Smith Title Environmental Engineer
Phone (740) 283-5542 24 Hr. Phone (304) 234-7244

Name Bud E. Smith Title Environmental Director
Phone (304) 234-2662 24 Hr. Phone (304) 234-7244

Important: Read all instructions before completing form

Reporting Period *From January 1 to December 31, 2006*

☐ Check if information below is identical to the information submitted last year.

Chemical Description	Physical and Health Hazards (check all that apply)	Inventory	Storage Codes and Locations (Non-Confidential) *Storage Locations*	
CAS 7647-01-0 Trade Secret ☐ Chem. Name Hydrochloric Acid Check all that apply: Pure ☐ Mix X Solid ☐ Liquid X Gas ☐ EHS ☐ EHS Name	Fire ☐ Sudden Release of Pressure ☐ Reactivity ☐ Immediate (acute) X Delayed (chronic) X	Max. Daily Amount (code) 04 Avg. Daily Amount (code) 04 No. of Days On-site (days) 365	A 1 4 T01, T02 N 1 4 B-MAIN, Floor 1	☐
CAS Trade Secret ☐ Chem. Name Zinc Slabs Check all that apply: Pure ☐ Mix X Solid X Liquid ☐ Gas ☐ EHS ☐ EHS Name	Fire ☐ Sudden Release of Pressure ☐ Reactivity ☐ Immediate (acute) X Delayed (chronic) X	Max. Daily Amount (code) 06 Avg. Daily Amount (code) 06 No. of Days On-site (days) 365	R 1 4 B-MAIN, Floor 1	☐
CAS Trade Secret ☐ Chem. Name Die Cast Check all that apply: Pure ☐ Mix X Solid X Liquid ☐ Gas ☐ EHS ☐ EHS Name	Fire ☐ Sudden Release of Pressure ☐ Reactivity ☐ Immediate (acute) X Delayed (chronic) ☐	Max. Daily Amount (code) 04 Avg. Daily Amount (code) 04 No. of Days On-site (days) 365	R 1 4 B-MAIN, Floor 1	☐

Certification ***(Read and sign after completing all sections)***

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 6 and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Bud E. Smith - Director, Environmental Control
Name and official title of owner/operator OR owner/operator's authorized representative

Bud E. Smith
Signature

2/26/2007
Date signed

Optional Attachments

- ^ I have attached a site plan
- ☐ I have attached a list of site coordinate abbreviations
- ☐ I have attached a description of dikes and other safeguard measures

Tier Two
EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification
WHEELING-PITTSBURGH STEEL CORPORATION
1001 MAIN ST.
MARTINS FERRY, OH 43935 BELMONT COUNTY

SIC Code 3 4 7 9 Dun & Brad Number 0 5 - 3 1 5 - 8 8 8 7

For OFFICIAL USE ONLY: ID# / Date Received

Owner/Operator Name
Name Wheeling-Pittsburgh Steel Corp. Phone (304) 234-2662
Mail Address 1134 Market Street, Wheeling , WV 26003

Emergency Contact
Name Patrick J. Smith Title Environmental Engineer
Phone (740) 283-5542 24 Hr. Phone (304) 234-7244

Name Bud E. Smith Title Environmental Director
Phone (304) 234-2662 24 Hr. Phone (304) 234-7244

Important: Read all instructions before completing form

Reporting Period *From January 1 to December 31, 2006*

☐ Check if information below is identical to the information submitted last year.

Chemical Description	Physical and Health Hazards (check all that apply)	Inventory	Storage Codes and Locations (Non-Confidential) *Storage Locations*	
CAS ... Trade Secret ☐ Chem. Name: Lime (Calcium Oxide) Check all that apply: ☒ Pure ☐ Mix ☒ Solid ☐ Liquid ☐ Gas ☐ EHS EHS Name:	☐ Fire ☐ Sudden Release of Pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	04 Max. Daily Amount (code) 04 Avg. Daily Amount (code) 365 No. of Days On-site (days)	H14 B-WWTP, Floor 1	☐
CAS ... Trade Secret ☐ Chem. Name: Ferrocote 61A US Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name:	☒ Fire ☐ Sudden Release of Pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	04 Max. Daily Amount (code) 04 Avg. Daily Amount (code) 365 No. of Days On-site (days)	O14 B-OIL, Floor 1	☐
CAS ... Trade Secret ☐ Chem. Name: Tectyl 861 SGD Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name:	☒ Fire ☐ Sudden Release of Pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	04 Max. Daily Amount (code) 04 Avg. Daily Amount (code) 365 No. of Days On-site (days)	O14 B-MAIN, Floor 1	☐

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Bud E. Smith - Director, Environmental Control
Name and official title of owner/operator OR owner/operator's authorized representative

Bud E. Smith
Signature

2/26/2007
Date signed

Optional Attachments

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☐ I have attached a list of site coordinate abbreviations
☐ I have attached a description of dikes and other safeguard measures

Tier Two EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification

WHEELING-PITTSBURGH STEEL CORPORATION
1001 MAIN ST.
MARTINS FERRY, OH 43935 BELMONT COUNTY

SIC Code: 3479 Dun & Brad Number: 05-315-8887

For OFFICIAL USE ONLY ID#: Date Received:

Owner/Operator Name

Name: Wheeling-Pittsburgh Steel Corp. Phone: (304) 234-2662

Mail Address: 1134 Market Street, Wheeling , WV 26003

Emergency Contact

Name: Patrick J. Smith Title: Environmental Engineer
Phone: (740) 283-5542 24 Hr. Phone: (304) 234-7244

Name: Bud E. Smith Title: Environmental Director
Phone: (304) 234-2662 24 Hr. Phone: (304) 234-7244

Important: Read all instructions before completing form

Reporting Period From January 1 to December 31, 2006

[ ] Check if information below is identical to the information submitted last year.

Chemical Description	Physical and Health Hazards (check all that apply)	Inventory	Storage Codes and Locations (Non-Confidential) Storage Locations	
CAS 64741-44-2; Trade Secret [ ]; Chem. Name: Diesel Fuel; Check all that apply: [ ] Pure [X] Mix [ ] Solid [X] Liquid [ ] Gas [ ] EHS; EHS Name:	[X] Fire; [ ] Sudden Release of Pressure; [ ] Reactivity; [X] Immediate (acute); [ ] Delayed (chronic)	Max. Daily Amount (code): 04; Avg. Daily Amount (code): 04; No. of Days On-site (days): 365	A 1 4 — T05	[ ]
CAS: ; Trade Secret [ ]; Chem. Name: Ammonium Chloride; Check all that apply: [ ] Pure [X] Mix [X] Solid [ ] Liquid [ ] Gas [ ] EHS; EHS Name:	[ ] Fire; [ ] Sudden Release of Pressure; [ ] Reactivity; [X] Immediate (acute); [X] Delayed (chronic)	Max. Daily Amount (code): 04; Avg. Daily Amount (code): 04; No. of Days On-site (days): 365	J 1 4 — B-MAIN, Floor 1	[ ]
CAS: ; Trade Secret [ ]; Chem. Name: Hydraulic Oil MC-42; Check all that apply: [ ] Pure [X] Mix [ ] Solid [X] Liquid [ ] Gas [ ] EHS; EHS Name:	[ ] Fire; [ ] Sudden Release of Pressure; [ ] Reactivity; [X] Immediate (acute); [X] Delayed (chronic)	Max. Daily Amount (code): 04; Avg. Daily Amount (code): 04; No. of Days On-site (days): 365	U 1 4 — B-MAIN, Floor 1; U 1 4 — B-OIL, Floor 1; U 1 4 — B-WWTP, Floor 1; U 1 4 — B-SHED, Floor 1	[ ]

Certification *(Read and sign after completing all sections)*

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Name and official title of owner/operator OR owner/operator's authorized representative

Bud E. Smith
Signature

2/26/2007
Date signed

Optional Attachments

[X] I have attached a site plan
[ ] I have attached a list of site coordinate abbreviations
[ ] I have attached a description of dikes and other safeguard measures

Revised [illegible] of 1990 — Form Approved OMB No. 2050-007[illegible]

Tier Two
EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification
WHEELING-PITTSBURGH STEEL CORPORATION
1001 MAIN ST.
MARTINS FERRY, OH 43935 BELMONT COUNTY

SIC Code 3 4 7 9 Dun & Brad Number 0 5 - 3 1 5 - 8 8 8 7

For OFFICIAL USE ONLY
ID#
Date Received

Owner/Operator Name
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Important: Read all instructions before completing form

Reporting Period *From January 1 to December 31, 2006*

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Chemical Description	Physical and Health Hazards (check all that apply)	Inventory	Storage Codes and Locations (Non-Confidential) *Storage Locations*	
CAS ____ Trade Secret ☐ Chem. Name 10-C Mineral Oil Check all that apply: Pure ☐ Mix X Solid ☐ Liquid X Gas ☐ EHS ☐ EHS Name	☐ Fire ☐ Sudden Release of Pressure ☐ Reactivity X Immediate (acute) X Delayed (chronic)	0 5 Max. Daily Amount (code) 0 5 Avg. Daily Amount (code) 3 6 5 No. of Days On-site (days)	R 1 4 B-MAIN, Floor 1 R 1 4 A01 R 1 4 A02 R 1 4 A03 R 1 4 A04 R 1 4 A05	☐
CAS ____ Trade Secret ☐ Chem. Name 10-C Mineral Oil Check all that apply: Pure ☐ Mix X Solid ☐ Liquid X Gas ☐ EHS ☐ EHS Name	☐ Fire ☐ Sudden Release of Pressure ☐ Reactivity X Immediate (acute) X Delayed (chronic)	0 5 Max. Daily Amount (code) 0 5 Avg. Daily Amount (code) 3 6 5 No. of Days On-site (days)	R 1 4 A07	☐
CAS ____ Trade Secret ☐ Chem. Name GF-60 Liquid Flux (Zinc Ammonium Chloride) Check all that apply: Pure ☐ Mix X Solid ☐ Liquid X Gas ☐ EHS ☐ EHS Name	☐ Fire ☐ Sudden Release of Pressure ☐ Reactivity X Immediate (acute) X Delayed (chronic)	0 5 Max. Daily Amount (code) U 4 Avg. Daily Amount (code) 3 6 5 No. of Days On-site (days)	A 1 4 T04	☐

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Bud E. Smith
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2/26/2007
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Tier Two
EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

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Chemical Description	Physical and Health Hazards (check all that apply)	Inventory	Storage Codes and Locations (Non-Confidential) *Storage Locations*	
CAS [ ] Trade Secret ☐ Chem. Name Quaker 4860-2 *Check all that apply:* Pure ☐ Mix X Solid ☐ Liquid X Gas ☐ EHS ☐ EHS Name	☐ Fire ☐ Sudden Release of Pressure ☐ Reactivity X Immediate (acute) ☐ Delayed (chronic)	04 Max. Daily Amount (code) 04 Avg. Daily Amount (code) 365 No. of Days On-site (days)	O14 B-MAIN, Floor 1	☐
CAS [ ] Trade Secret ☐ Chem. Name MC-Series Lubricants (Misc. Grades) *Check all that apply:* Pure ☐ Mix X Solid ☐ Liquid X Gas ☐ EHS ☐ EHS Name	☐ Fire ☐ Sudden Release of Pressure ☐ Reactivity X Immediate (acute) X Delayed (chronic)	04 Max. Daily Amount (code) 03 Avg. Daily Amount (code) 365 No. of Days On-site (days)	D14 B-OIL, Floor 1 R14 B-MAIN, Floor 1 D14 B-MAIN, Floor 1	☐
CAS [ ] Trade Secret ☐ Chem. Name Potassium Hydroxide (50%) *Check all that apply:* Pure ☐ Mix X Solid ☐ Liquid X Gas ☐ EHS ☐ EHS Name	☐ Fire ☐ Sudden Release of Pressure ☐ Reactivity X Immediate (acute) X Delayed (chronic)	04 Max. Daily Amount (code) 04 Avg. Daily Amount (code) 365 No. of Days On-site (days)	O14 B-WWTP, Floor 1	☐

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Revised [illegible]er 1990

Form Approved OMB No. 2050-0072

Tier Two
EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification

WHEELING-PITTSBURGH STEEL CORPORATION
1001 MAIN ST.
MARTINS FERRY, OH 43935 BELMONT COUNTY

SIC Code 3 4 7 9 Dun & Brad Number 0 5 - 3 1 5 - 8 8 8 7

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Chemical Description	Physical and Health Hazards (check all that apply)	Inventory	Storage Codes and Locations (Non-Confidential) Storage Locations	
CAS [ ] Trade Secret ☐ Chem. Name Gasoline Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☐ Sudden Release of Pressure ☐ Reactivity ☒ Immediate (acute) ☒ Delayed (chronic)	0 4 Max. Daily Amount (code) 0 4 Avg. Daily Amount (code) 3 6 5 No. of Days On-site (days)	B 1 4 — T03	☐
CAS [ ] Trade Secret ☐ Chem. Name Used Oil Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☐ Fire ☐ Sudden Release of Pressure ☐ Reactivity ☒ Immediate (acute) ☒ Delayed (chronic)	0 4 Max. Daily Amount (code) 0 4 Avg. Daily Amount (code) 3 6 5 No. of Days On-site (days)	O 1 4 — B-SHED, Floor 1 D 1 4 — B-SHED, Floor 1 O 1 4 — B-OIL, Floor 1	☐
CAS [ ] Trade Secret ☐ Chem. Name Montgomery PL-7105A Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☐ Fire ☐ Sudden Release of Pressure ☐ Reactivity ☒ Immediate (acute) ☒ Delayed (chronic)	0 4 Max. Daily Amount (code) 0 4 Avg. Daily Amount (code) 3 6 5 No. of Days On-site (days)	O 1 4 — B-MAIN, Floor 1 O 1 4 — B-OIL, Floor 1	☐

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2/26/2007
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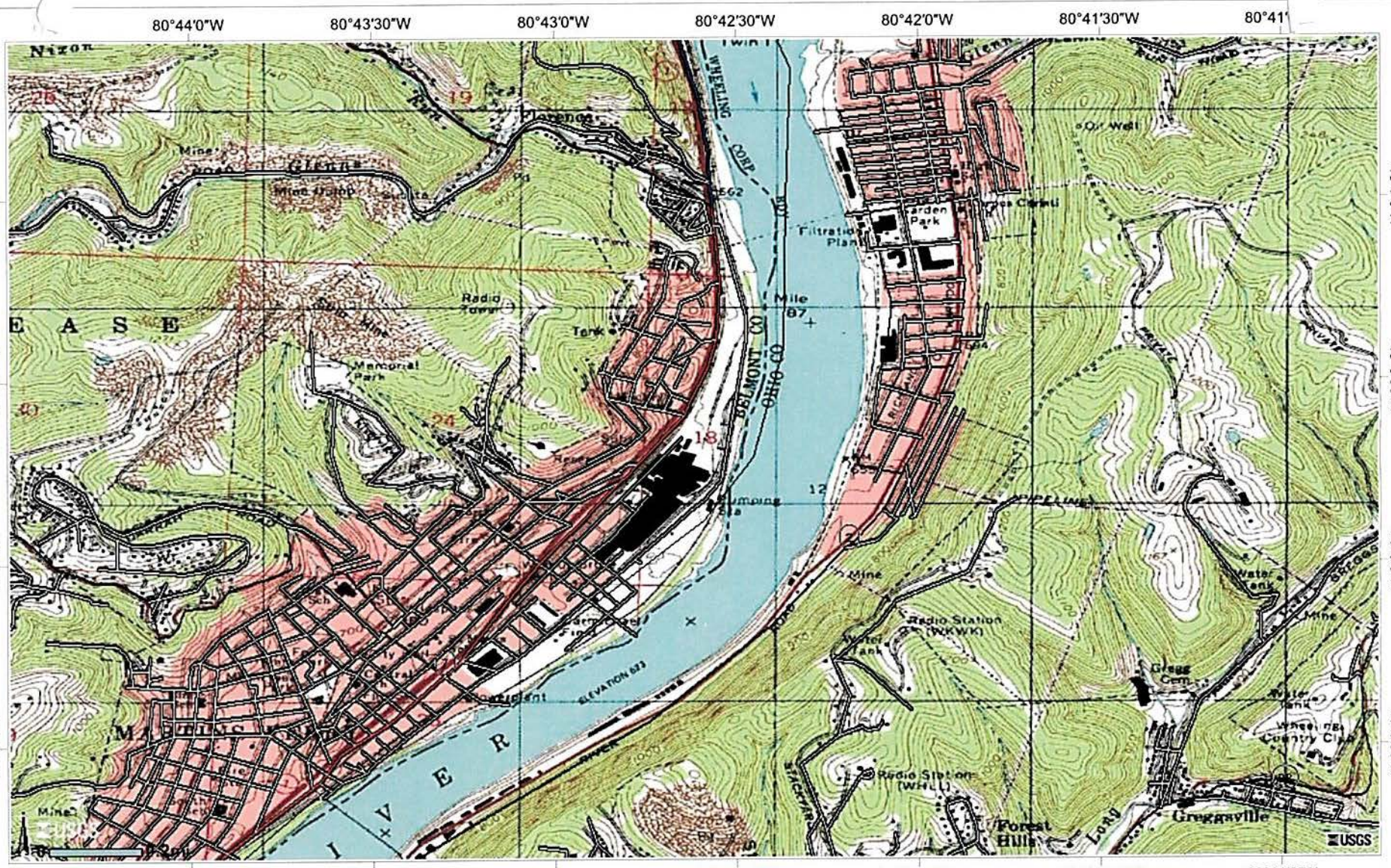

USGS
science for a changing world

40°7'26"N
80°44'30"W Map Extent 80°40'44"W
40°5'12"N

Figure 1

The National Map
http://nationalmap.gov/

ordinate System (WGS84)